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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**
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16 DESTINIE MULLEN, an Individual,

17 Plaintiff,

18 vs.

19 NUGENT, LLC, a Nevada limited liability
20 company d/b/a GREAT CLIPS, DOES I -X;
21 and ROE CORPORATIONS I -X.

22 Defendant.

CASE NO.: 2:19-cv-01109-GMN-GWF

23 **STIPULATION AND ORDER TO**
24 **EXTEND TIME FOR PLAINTIFF TO**
25 **RESPOND TO DEFENDANT GREAT**
26 **CLIPS, INC.'S MOTION TO DIMISS**
27 **PLAINTIFF'S SECOND AMNEDED**
28 **COMPLAINT**

(FIRST REQUEST)

Plaintiff DESTINIE MULLEN ("Plaintiff") and Defendant GREAT CLIPS, INC., by and through their respective attorneys, hereby stipulate and agree as follows:

1. Plaintiff was served with Defendant Great Clips, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint on May 5, 2021.

2. Plaintiff's response to the Motion to Dismiss Plaintiff's Second Amended Complaint is currently due on May 19, 2021.

3. Plaintiff and Great Clips, Inc. are reviewing documents and are involved in discussions to determine whether or not an agreement can be reached as to whether or not Great Clips, Inc. is a proper defendant in this litigation and need additional time to complete that process

4. In order to avoid unnecessary time and expense in connection with motions to dismiss and other litigation matters pertaining to the Motion to Dismiss Plaintiff's Second Amended Complaint, Plaintiff and Great Clips, Inc. have agreed to extend the time by which Plaintiff shall be required to respond to Defendant Great Clips, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint by a period of two (2) weeks.

5. Pursuant to this agreement between Plaintiff and Great Clips, Inc., Plaintiff shall be required to file a response to the Motion to Dismiss Plaintiff's Second Amended Complaint on or before June 2, 2021

6. Plaintiff and Great Clips, Inc. agree that good cause exists for the request for the extension of the deadline for a response to the Motion to Dismiss Plaintiff's Second Amended Complaint for the above-specified reasons.

7. Plaintiff and Great Clips, Inc. agree that the requested extension is warranted under the current circumstances and will not result in an undue or significant delay in the administration of this case.

Dated this 17th day of May, 2021.

HKM EMPLOYMENT ATTORNEYS
LLP

/s/ Jenny L. Foley
Jenny L. Foley, Ph.D., Esq.
Nevada Bar No. 9017
1785 East Sahara Ave., Suite 300
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Attorney for Plaintiff

Dated this 17th day of May, 2021.

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

/s/ Suzanne L. Martin
Suzanne L. Martin, Esq.
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Las Vegas, NV 89169
Attorneys for Defendant Great Clips, Inc.

IT IS SO ORDERED *nunc pro tunc*.

Dated this 21 day of May, 2021

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT